

**REMARKS**

In response to the Office Action dated October 31, 2006, Applicants respectfully requests reconsideration.

**Claim Rejections- 35 U.S.C. § 102**

Claims 1, 4, 5 and 8-10 stand rejected under 35 U.S.C. 102(e) as being anticipated U.S. Patent No. 7,042,737 (Woolsey). Further, claims 14-24 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 6,552,915 (Takahashi). Applicants respectfully assert that these claims are patentable over Woolsey and Takahashi respectively. Applicants thank the Examiner for the teleconference of March 23, 2007. During that teleconference, Applicants and the Examiner discussed the surge protection of independent claims 1, 14 and 20, and the cited references. Accordingly, Applicants have endeavored to incorporate the content of the interview into this response and respectfully assert that these claims are in condition for allowance.

Regarding independent claim 8, Woolsey does not teach, disclose or suggest a chassis for use in a rack of electronic data communications equipment and with modules configured for data communications including electrically-conductive bias members coupled to a buss and configured and disposed to contact and be biased against portions of respective circuit boards. Woolsey discusses a midplane chassis shield 108 that includes guides 132 for aligning and securing an interface module 106 to the midplane chassis shield 108. (Col. 4, ll. 28-31). The guides 132 provide multiple grounds between the interface module container 114 and the midplane chassis shield 108. (Col. 4, ll. 31-34). As shown in FIG. 8, the guides 132 are positioned to engage and retain the interface module container 114. (Col. 4, ll. 39-41, emphasis added). In Woolsey, the circuit board 112 is substantially contained within the interface container 114. (Col. 4, 26-27). Thus, the guides 132 in Woolsey only contact the interface module container, and do not contact portions of the circuit board 112. In contrast, claim 8 recites a chassis for use in a rack of electronic data communications equipment and with modules configured for data communications including a plurality of electrically-conductive bias members

coupled to a buss and configured and disposed to contact and be biased against portions of respective circuit boards of the modules with the modules received by the chassis. For at least these reasons, independent claim 8, and claims 9 and 10 which depend directly and indirectly from claim 8, are not anticipated by Woolsey.

Regarding independent claim 14, Takahashi does not teach, disclose, or suggest a replaceable module for use with a rack-mountable data communications chassis that provides a plurality of openings each configured for receiving the module including a circuit board configured to provide surge-protection between an input and an output. Takahashi discusses a telecommunications sub-rack unit with plug-in units inserted into the front side of the sub-rack. (Abstract). A plug-in unit includes a die cast front member 42, a printed board 43 mounting electronic components (which are not disclosed) that compose an electronic circuit. (Col. 5, ll. 62-66). Thus, Takahashi merely discloses that the plug-in units include circuit boards, and does not teach, disclose or suggest circuit boards configured to provide surge protection. In contrast, claim 14 recites a replaceable module for use with a rack-mountable data communications chassis that provides a plurality of openings each configured for receiving the module including a circuit board configured to provide surge-protection between an input and an output. Thus, for at least these reasons, independent claim 14, and claims 15-19 that depend directly and indirectly from claim 14, are not anticipated by Takahashi.

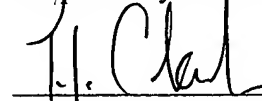
#### **Claim Rejections-35 U.S.C. § 103**

Claims 2,3,6,7, and 11-13 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 7,042,737 (Woolsey) in view of U.S. Patent No. 6,552,915 (Takahashi). Applicants respectfully assert that these claims are patentable over Woolsey and Takahashi. The Examiner does not assert that Takahashi makes up for the deficiencies of Woolsey noted above with respect to independent claims 1 and 8. Thus, claims 2, 3, 6, and 7, which depend directly and indirectly from claim 1, and claims 11-13, which depend directly and indirectly from claim 8, are patentable over Woolsey in view of Takahashi.

**Conclusion**

Based on the foregoing, this application is believed to be in allowable condition, and a notice to that effect is respectfully requested. The Examiner is invited to call the Applicants' Attorney at the number provided below with any questions.

Respectfully submitted,



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